

# COMPLAINT

## EXHIBIT A

Kevin Orsini

Inbox - csimon@bergerkahn.com 6:41 AM

KO

Butte County Hardware Collection

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To: Frank Pitre, Mike Kelly, kbaghdadi@walkuplawoffice.com, Steve Campora, Waylon Pickett, Mark Grotefeld, John Fiske, Craig Simon, Dario de Ghetaldi,

Cc: Matt Feldman, Cecily A. Dumas, Omid Nasab, Christopher Beshara, Stephen Karotkin



Counsel,

At the request of the Butte County District Attorney's office (the "Butte DA"), PG&E recently assisted the Butte DA with the collection of certain components from four towers on the Caribou-Palermo 115 kV Transmission Line: Towers :20/160, :24/199, :32/260 and :35/281. On April 3, the Butte DA informed PG&E that it intends to have the FBI National Lab in Quantico, Virginia perform partially destructive testing on cross arm sections and suspension hooks taken from the four towers, as well as cross arms and suspension hooks from Tower :27/222 that have been in CAL FIRE's possession since November 2018. Prior to sending the tower components to Quantico for testing, the Butte DA and CAL FIRE intend to cut the final 24 inches of the cross arms from Towers :20/160, :27/222 and :35/281 that are necessary for the Butte DA's testing purposes. (On March 29, at the Butte DA's request, this was already done for the cross arms removed from Towers :24/199 and :32/260.) On April 9, PG&E counsel discussed this request with representatives of CAL FIRE and the Butte DA's office.

We understand that once the hardware is sent to the FBI National Lab, it will not be available for any further examination for the foreseeable future. PG&E expects to receive additional information concerning destructive testing that the Butte DA and the lab request. The Butte DA has offered to make the hardware available for inspection by PG&E [on April 17](#) prior to its transfer to the FBI National Lab. PG&E has accepted that offer, and expects that it will be able to reach agreement with the Butte DA for appropriate protocols for any destructive testing.

The Butte DA has requested that any information obtained from PG&E's inspection remain confidential pending the investigation.

I will be leaving the country later today and will have limited access to email. As a result, please make sure to include Omid Nasab and Chris Beshara on any correspondence concerning this issue. They are both copied above.

Kevin

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